

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

WILMA KPOHANU	:	
Petitioner,	:	Civil Action: 2:11 CV 903
v.	:	Criminal No. 2:05 CR 250
	:	Judge Frost
UNITED STATES OF AMERICA,	:	Magistrate Judge Kemp
Respondent.	:	

**UNITED STATES' REQUEST FOR ADDITIONAL
TIME TO RESPOND TO §2255 PETITION**

The Respondent-Plaintiff, the United States of America, respectfully requests addition to file its answer to Petitioner-Defendant Wilma Kpohanu's § 2255 Petition filed in the above-captioned case and respectfully moves the Court for an extension of time to November 25, 2011.

MEMORANDUM IN SUPPORT OF MOTION

On October 11, 2011, the Court entered an order directing the United States to file its answer to Kpohanu's petition by November 2, 2011. Doc. #140. Due to counsel for the United States' current workload, it is extremely difficult for counsel to complete its response in this case by November 2, 2011. Counsel for the United States' is conducting a jury trial before Judge Sargus which started on October 11, 2011, and is expected to be completed on or about October 19, 2011. In addition, undersigned counsel has been scheduled for several weeks to attend an out-of-state continuing legal education course, for which airline tickets have been purchased,

expects to attend the course if practicable when the jury trial ends, and is not due back in the office until October 24, 2011. Lastly, the undersigned counsel is scheduled for a jury trial before Judge Graham on November 7, 2011, and needs to engage in significant trial preparation for that one-week trial.

Counsel for the United States needs additional time to review the record, applicable case law and statutes in order to complete the preparation of its response. For these reasons, the United States respectfully requests an extension until November 25, 2011, to file its response.

Respectfully submitted,

CARTER M. STEWART
United States Attorney

s/Douglas W. Squires
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing motion for additional time was served this 17th day of October, 2011, by regular mail on:

Wilma Kpohanu 66786-061
Alderson
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Glen Ray Road Box A
Alderson, WV 24910

s/Douglas W. Squires
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